



HERITAGE-WTI, INC.  
1250 St. George Street  
East Liverpool, Ohio 43920-3400  
Phone: 330-385-7337  
Fax: 330-385-7813  
Web Site: www.heritage-wti.com

OHSAS 18001: 2007  
ISO 14001: 2004  
ISO 9001: 2008

Mr. Scott Nally <sup>Director</sup> 614-644 3020  
Ohio Environmental Protection Agency -  
P.O. Box 1049  
Columbus, OH 43216-1049

January 13, 2012  
CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

RE: Unmanifested Waste Report - Rule 3745-54-76 of the Ohio Administrative Code  
Heritage - WTI, Inc.  
USEPA ID No.: OHD 980 613 541 / Ohio Permit no.: 02-15-0589

Dear Mr. Nally:

This letter is being submitted in accordance with rule 3745-54-76 of the Ohio Administrative Code. Rule 3745-54-76 of the Administrative Code requires a facility who accepts for treatment, storage, or disposal any hazardous waste from an off-site source without an accompanying manifest, or without an accompanying shipping paper as described in paragraph (E)(2) of rule 3745-53-20 of the Administrative Code, and if the waste is not excluded from the manifest requirement by rule 3745-51-05 of the Administrative Code to prepare and submit a single copy of an "Unmanifested Waste Report" to the director within fifteen days after receiving the waste. The specified information is given below.

1. The EPA Identification number, name, and address of the facility

USEPA ID No.: OHD 980 613 541  
Heritage - WTI, Inc.  
1250 Saint George Street  
East Liverpool, OH 43920

2. The date the facility received the waste

The waste was received at Heritage - WTI, Inc. on December 13, 2011.

Scott: Director: — Profile of the waste  
614-644-2782

Matt Hiddle 614-728-5369

~~Jeff P~~

Tammy More

Susan



Recycled Paper

503-378-5310

## **SHEWCZYK Susan**

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**From:** FULLER Brian  
**Sent:** Tuesday, February 14, 2012 12:07 PM  
**To:** SHEWCZYK Susan  
**Subject:** FW: WTI letter  
**Attachments:** Incorrect Manifest Letter.pdf

Hi Susan,

Will you please look into if Wah Chang violated any RCRA requirements in Oregon and get back to me on what you conclude? It may be helpful to talk with Ohio folks listed on the letter to learn more about the waste and let them know that you are the Oregon DEQ point of contact on this issue if they have questions for us.

Thanks

-----Original Message-----

**From:** Kevin Schanilec [<mailto:Schanilec.Kevin@epamail.epa.gov>]  
**Sent:** Tuesday, February 14, 2012 11:40 AM  
**To:** FULLER Brian  
**Subject:** WTI letter

Hi Brian:

Not sure if you've seen this, a letter from the Ohio TSD to the State of Ohio regarding the waste in question.

Thanks - Kevin

(See attached file: Incorrect Manifest Letter.pdf)

Kevin Schanilec  
Compliance Officer, Air/RCRA Compliance Unit US Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 900, MS-OCE-127 Seattle, WA 98101  
(206) 553-1061  
(206) 553-8509 (fax)  
[schanilec.kevin@epa.gov](mailto:schanilec.kevin@epa.gov)

*Fuller fine D003  
1991 Inspector*

3. *The EPA identification number, name, and address of the generator and transporter, if available:*

Generator: USEPA I.D. No.: ORD 050 955 848  
Wah Chang - North  
1600 Old Salem Road NE  
Albany, OR 97321-0460

Transporter #1: USEPA I.D. No.: KSO 000 336 891  
Savannah Transport, Inc.  
4425 NW Highway 24  
Topeka, KS 66618

4. *A description and the quantity of each unmanifested hazardous waste and facility received:*

The material was received at the Heritage - WTI, Inc. (WTI) facility in East Liverpool, OH. The material was shipped as a Flammable Solid on a Uniform Hazardous Waste Manifest without any hazardous waste codes. Specifically, the D.O.T. description did not identify the materials involved as a hazardous waste nor was the shipment carrying hazardous waste codes. WTI received 40 containers on this shipment.

On December 17, 2011, WTI experienced an incident with this material. After the incident, the generator indicated that the material WTI received had a chemical composition of 100% zirconium instead of the 65% zirconium that was listed in the WTI waste stream information. Based on the information from the generator and the incident involving the material, WTI believes this material should carry hazardous waste codes D001 and D003. Specifically, we believe the containers involved in the incident contained waste material that was capable of causing fire through friction, absorption of moisture, or spontaneous chemical changes and when ignited, burned so vigorously and persistently as to create a hazard. Further, we believe that the containers involved in the incident contained materials that were readily capable of detonation or explosive decomposition or reaction at standard temperature and pressure.

We currently are in the process of developing a protocol to safely sample and test the waste to determine whether the remaining containers possess the same physical properties and hazards as the containers involved in the incident.

5. *The method of treatment, storage, or disposal for each hazardous waste:*

The waste was and is being managed as a hazardous waste at WTI. WTI reserves the right to reject all or part of the remaining containers of this shipment, and will do so in accordance with OAC 3745-54-72(D). Prior to the incident, WTI had processed six (6) containers of this material. There were two (2) containers involved in the incident, and 32 containers that remain in storage. Until WTI can determine whether the material can be safely rejected to either the original generator or to an alternate facility, the material will remain in a secure location at the WTI facility.

Do you have  
profile.

6. *The certification signed by the owner or operator of the facility or his authorized representative; and*

The certification is provided below.

7. *A brief description of why the waste was manifested, if known:*

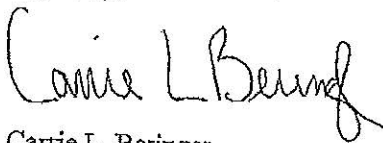
Unknown. WTI establishes a waste stream profile for its customers/generators based on wastestream information provided on standardized forms to our personnel. In this instance, the material was identified and shipped as non-hazardous by the generator. After the incident at WTI, the material is believed to be hazardous for D001 and D003.

Please note that the waste material in question was transported in a vehicle which has the appropriate licenses to transport hazardous waste, to a RCRA permitted incinerator, that all parties involved have EPA identification numbers, and the material was designated for and is being managed in hazardous treatment and storage systems at a RCRA-permitted facility.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

I trust that this information is adequate for your purpose. If there are any questions or comments regarding this matter, please contact me at 330.385.7336.

Sincerely,



Carrie L. Beringer  
Environmental, Health, and Safety Manager  
Heritage - WTI, Inc.

cc: Frank Popotnik - OEPA/DHWM/NEDO  
Michelle Tarka - OEPA/DHWM/NEDO

Tammy - 614 644 2922

 **Ohio**Environmental  
Protection Agency

DATE:

Feb 16, 2012

PAGES:

4

TO:

Susan Shewczuk

ORGANIZATION:

PHONE:

(503) 378-5310

FAX:

(503) 373-7944

FROM:

Tammy McConnell

PROGRAM:

Ohio EPA DSIWM

PHONE:

(614) 644-2922

FAX:

RE:

COMMENTS:

Hi, Susan.

Attached, please find the  
only documents we have  
received to date.

Tammy

**FAX**

Division of Materials and Waste Management

Phone: 614 | 644-2621

Fax: 614 | 528-5315

P.O. Box 1049, Columbus, OH 43216-1049 [www.epa.ohio.gov/dmwm](http://www.epa.ohio.gov/dmwm)



RECEIVED

JAN 17 2012

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Recycled Paper

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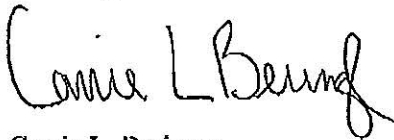
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